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PETER SULLIVAN, SBN 101428
PSullivan@gibsondunn.com
SAMUEL G. LIVERSIDGE, SBN 180578
SLiversidge@gibsondunn.com
CHRISTOPHER CHORBA, SBN 216692
CChorba@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
333 South Grand Avenue
Los Angeles, California 90071-3197
Telephone: (213) 229-7000
Facsimile: (213) 229-7520

Attorneys for Defendant
HEWLETT-PACKARD COMPANY

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

CARL K. RICH and DAVID DURAN,
individually and on behalf of all others similarly
situated,

Plaintiff,

v.

HEWLETT-PACKARD COMPANY, a
California Corporation; and DOES 1 through
250, inclusive,

Defendants.

CASE NO. C-06-03361-JF (HRL)

**STIPULATION AND [PROPOSED] ORDER
TO CONTINUE THE DEADLINE TO
COMPLETE THE ADR PROCESS**

[N.D. Cal. Local Rule 6-1(b)]

Through this Joint Stipulation and [Proposed] Order Plaintiff Carl Rich and David Duran (“Plaintiffs”) and Defendant Hewlett-Packard Company (“Defendant”) agree to continue the deadline to complete the ADR process an additional ninety days, to and including May 29, 2007. The parties hereby request that the Court approve this extension pursuant to Civil L.R. 6-1(b).

JOINT STIPULATION

WHEREAS the parties filed their stipulation selecting an ADR process pursuant to Civil L.R. 16-8 and ADR L.R. 3-5;

WHEREAS the parties' stipulation provided for private, non-binding mediation to be completed by February 28, 2007;

WHEREAS Plaintiffs recently amended their complaint following the Court's order dated December 4, 2006, on Defendant's Motion to Dismiss;

WHEREAS pursuant to Local Rule 6-1(a) the parties agreed to extend the deadline for Defendant to answer the Second Amended Complaint to February 28, 2007; and

WHEREAS the parties agree that they require additional time to investigate the claims in Plaintiffs' Second Amended Complaint and to assess their respective positions before conducting a mediation session in this matter.

ACCORDINGLY, pursuant to Local Rule 6-1(b), the parties, by and through their counsel of record, hereby stipulate to, and request the Court's approval of an extension of the deadline to complete the ADR process an additional ninety days, to and including May 29, 2007.

IT IS SO STIPULATED.

DATED: February 27, 2007

KABATECK BROWN KELLNER LLP

By:  _____
Brian S. Kabateck

Attorneys for Plaintiffs

DATED: February 27, 2007

GIBSON, DUNN & CRUTCHER LLP

By:  _____
Christopher Chorba

Attorneys for Defendant

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[PROPOSED] ORDER

Pursuant to the parties' stipulation, the deadline to complete private non-binding mediation in the above-captioned matter is hereby continued to May 29, 2007.

IT IS SO ORDERED.

DATED: 3/2/07



UNITED STATES DISTRICT JUDGE

Jeremy Fogel

CERTIFICATE OF SERVICE

I, Christopher Chorba, hereby certify that on February 27, 2007, I caused the foregoing
**STIPULATION AND [PROPOSED] ORDER TO CONTINUE THE DEADLINE TO
COMPLETE THE ADR PROCESS** to be electronically filed and served upon the persons named
below via the Court's Electronic Case Filing ("ECF") system. This document is available for
reviewing and downloading from the ECF system.

Attorneys for Plaintiffs

KABATECK BROWN KELLNER LLP
BRIAN S. KABATECK
RICHARD L. KELLNER
ALFREDO TORRIJOS
350 South Grand Avenue, 39th Floor
Los Angeles, CA 90071
TEL: (213) 217-5000
FAX: (213) 217-5010

COTCHETT, PITRE & MCCARTHY
NIAL P. MCCARTHY
LAURA E. SCHLICHTMANN
840 Malcolm Road, Suite 200
Burlingame, CA 94010
TEL: (650) 697-6000
FAX: (650) 692-3606

MCNICHOLAS & MCNICHOLAS
PATRICK MCNICHOLAS
10866 Wilshire Boulevard, #1400
Los Angeles, CA 90024
TEL: (310) 474-1582
FAX: (310) 475-7871

THE GARCIA LAW FIRM
STEPHEN M. GARCIA
1 World Trade Center #1950
Long Beach, CA 90831-1950
TEL: (562) 216-5270
FAX: (562) 216-5271

DATED: February 27, 2007

GIBSON, DUNN & CRUTCHER LLP
PETER SULLIVAN
SAMUEL G. LIVERSIDGE
CHRISTOPHER CHORBA

By: /s/ Christopher Chorba*

Attorneys for Defendant HEWLETT-PACKARD
COMPANY

*I hereby attest that I have on file all holograph
signatures for any signatures indicated by a "conformed"
signature (/s/) within this efiled document.